Jared McClure - PMK

Knight vs. Midland Credit Management, Inc.

Jai	ea mcolare	- 1 IVIIX					midiana ore	· · ·
1		UNITED STATES DISTRIC	T COURT	Page 1	1	UN	NITED STATES DIS	Page TRICT COURT
2	EF	ASTERN DISTRICT OF PEN	NSYLVANIA		2	EAST	TERN DISTRICT OF	PENNSYLVANIA
3					3			
4	RENEISHA KNIGH				4	RENEISHA KNIGHT,)
_	of herself and					of herself and a)
5	similarly situ	nated consumers,)			5	similarly situat	ed consumers,)
6	I	Plaintiff,)			6	Pla	nintiff,)
7	vs.) C	ase No. s:17-c	v-03118	7	vs.) Case No. s:17-cv-03118
8	MIDLAND CREDIT	r MANAGEMENT, INC.,)			8	MIDLAND CREDIT M	MANAGEMENT, INC.	,)
9	Ι	Defendant.)			9	Def	endant.)
10 11					10			_)
12					11			
13					12			
14	DEPOSIT	TION OF PERSON MOST KN	OWLEDGEABLE		13			
15		JARED McCLURE			14			
16		SAN DIEGO, CALIFOR	NIA		15			
17		FEBRUARY 13, 2019			16			
18					17			
19					18	Depositio	on of Person Mos	=
20					19		JARED McCLU	,
21					20	_	_	urt Reporting, 600 West
22					21			go, California, on
23	REPORTED BY:				22			eginning at 11:30 a.m.
	KATRINA F. BUF				23	_	_	fore Katrina F. Burlason
24 25	RPR, CSR NO. 5 JOB NO.: 1005				24 25	RPR, Certified S Notice.	Shorthand Report	er No. 5898, pursuant to
1		INDEX		Page 3	1	INDEX (CO	M T T N II T D)	Page
2	WITHERR D M	.K. JARED McCLURE		PAGE		INDEX (CO.	N I I N O E D)	
3	Examination by			7	2			
4		y Mr. Schwartz		81	3			
5		7			4	INFORMATION	REQUESTED:	
6					5	PAGE	LINE	
7		EXHIBIT	S		6	(NO		
8	PLAINTIFF'S:	DESCRIPTION		PAGE	"	(NO)	NL)	
9	Exhibit A	Plaintiff's Notice of Deposition of Defender	_	8	7 8			
10		Representatives Pur			9	QUESTIONS IN	STRUCTED:	
		Fed. R. Civ. P. 30()			10	PAGE	LINE	
11		3 Pages	-, (-,)					
12	Exhibit B	Exhibit A Letter to	Knight	30	11	71	14	
_		from the Complaint	J	. .	12			
13					13			
	Exhibit C	Revised Template Le	tter to	31	14			
		Branch from Exhibit						
14			_	56	15			
14 15	Exhibit D	Midland's Production	n, Bates 1-39					
15	Exhibit D Exhibit E	Midland's Production Defendant Midland C		70	16			
			redit		16			
15		Defendant Midland C	redit Answer to					
15 16		Defendant Midland Co	redit Answer to		17 18			
15 16		Defendant Midland C Management, Inc.'s A Plaintiff's Second A	redit Answer to		17 18 19			
15 16 17		Defendant Midland C Management, Inc.'s A Plaintiff's Second A	redit Answer to Amended		17 18 19 20			
15 16 17	Exhibit E	Defendant Midland C Management, Inc.'s A Plaintiff's Second A Complaint	redit Answer to Amended Branch	70	17 18 19			
15 16 17 18 19	Exhibit E	Defendant Midland Commanagement, Inc.'s in Plaintiff's Second in Complaint 8-24-2015 Letter to	redit Answer to Amended Branch o Branch	70 72	17 18 19 20			
15 16 17 18 19 20	Exhibit E Exhibit F Exhibit G	Defendant Midland Commanagement, Inc.'s in Plaintiff's Second in Complaint 8-24-2015 Letter to 11-02-2016 Letter to	redit Answer to Amended Branch D Branch Branch	70 72 75	17 18 19 20 21 22			
15 16 17 18 19 20 21	Exhibit F Exhibit G Exhibit H	Defendant Midland Commanagement, Inc.'s in Plaintiff's Second in Complaint 8-24-2015 Letter to 11-02-2016 Letter to 3-08-2017 Letter to	redit Answer to Amended Branch D Branch Branch	70 72 75 79	17 18 19 20 21 22 23			
15 16 17 18 19 20 21 22	Exhibit F Exhibit G Exhibit H	Defendant Midland Commanagement, Inc.'s in Plaintiff's Second in Complaint 8-24-2015 Letter to 11-02-2016 Letter to 3-08-2017 Letter to	redit Answer to Amended Branch D Branch Branch	70 72 75 79	17 18 19 20 21 22			

Knight vs. Midland Credit Management, Inc.

			Page 1			Page
1		UNITED STATES DISTRICT COURT		1	UNITED STATES DISTRICT COURT	
2		STERN DISTRICT OF PENNSYLVANIA	1	2	EASTERN DISTRICT OF PENNSYLVANIA	
3			•	3	BIOTHER DISTRICT OF THEORY	
	DENETALLY WILLIAM	rm				
4	RENEISHA KNIGH			4	RENEISHA KNIGHT, on behalf)	
	of herself and	all other)			of herself and all other)	
5	similarly situ	ated consumers,)		5	similarly situated consumers,)	
))	
6	F	Plaintiff,)		6	Plaintiff,)	
)		"	riametri,	
7	vs.	, Caso No. s	s:17-cv-03118)	
′	vs.) case No. s	3.17-CV-03116	7	vs.) Case No. s:17-	cv-0311
))	
8	MIDLAND CREDIT	MANAGEMENT, INC.,)		8	MIDLAND CREDIT MANAGEMENT, INC.,)	
))	
9	Γ	efendant.)		9	Defendant.)	
)			Defendanc.	
10)	
11				10		
12				11		
				12		
13				13		
14	DEPOSIT	TION OF PERSON MOST KNOWLEDGEAR	BLE	14		
15		JARED McCLURE				
16		SAN DIEGO, CALIFORNIA		15		
17		FEBRUARY 13, 2019		16		
18				17		
				18	Deposition of Person Most Knowledgeable	
19				19	JARED McCLURE,	
20						
21				20	taken by Plaintiff, at Aptus Court Reporting, 60	0 West
22				21	Broadway, Suite 300, in San Diego, California, o	n
23	REPORTED BY:			22	Wednesday, February 13, 2019, beginning at 11:30	a.m.
	KATRINA F. BUR	I A SON		23	and concluding at 1:54 p.m., before Katrina F. B	urlason
24				24	RPR, Certified Shorthand Reporter No. 5898, purs	
24	RPR, CSR NO. 5					uant to
25	JOB NO.: 1005	2252		25	Notice.	
			Page 3			Page
1		INDEX	rage 3	1	INDEX (CONTINUED)	raye
2	мттигсс. в м	.K. JARED McCLURE	PAGE			
				2		
3	Examination by		7	3		
4	Examination by	y Mr. Schwartz	81			
5				4	INFORMATION REQUESTED:	
6				5	PAGE LINE	
7		EXHIBITS		_	(NOVE)	
8	DIATMOTERIO		PAGE	6	(NONE)	
•	PLAINTIFF'S:	DESCRIPTION		7		
9	Exhibit A	Plaintiff's Notice of Taking		0		
		Deposition of Defendant ERC'	s	8		
10		Representatives Pursuant to		9	QUESTIONS INSTRUCTED:	
		Fed. R. Civ. P. 30(B)(6),		10	PAGE LINE	
11						
+ +	m-1-23-23-	3 Pages	2 -	11	71 14	
	Exhibit B	Exhibit A Letter to Knight	30	12		
				1 12		
		from the Complaint				
12				13		
12		from the Complaint	31			
12	Exhibit C	from the Complaint Revised Template Letter to	31	14		
12 13	Exhibit C	from the Complaint Revised Template Letter to Branch from Exhibit A, 2 Pag	jes			
12 13	Exhibit C	from the Complaint Revised Template Letter to Branch from Exhibit A, 2 Pag Midland's Production, Bates	jes	14 15		
12 13 14 15	Exhibit C	from the Complaint Revised Template Letter to Branch from Exhibit A, 2 Pag	jes	14 15 16		
12 13 14 15	Exhibit C	from the Complaint Revised Template Letter to Branch from Exhibit A, 2 Pag Midland's Production, Bates	ges 1-39 56 70	14 15		
12 13 14 15 16	Exhibit C	Revised Template Letter to Branch from Exhibit A, 2 Pag Midland's Production, Bates Defendant Midland Credit Management, Inc.'s Answer to	ges 1-39 56 70	14 15 16 17		
12 13 14 15 16	Exhibit C	Revised Template Letter to Branch from Exhibit A, 2 Pag Midland's Production, Bates Defendant Midland Credit Management, Inc.'s Answer to Plaintiff's Second Amended	ges 1-39 56 70	14 15 16 17 18		
12 13 14 15 16	Exhibit C	Revised Template Letter to Branch from Exhibit A, 2 Pag Midland's Production, Bates Defendant Midland Credit Management, Inc.'s Answer to	ges 1-39 56 70	14 15 16 17		
12 13 14 15 16	Exhibit C	Revised Template Letter to Branch from Exhibit A, 2 Pag Midland's Production, Bates Defendant Midland Credit Management, Inc.'s Answer to Plaintiff's Second Amended	ges 1-39 56 70	14 15 16 17 18		
12 13 14 15 16 17	Exhibit C	Revised Template Letter to Branch from Exhibit A, 2 Pag Midland's Production, Bates Defendant Midland Credit Management, Inc.'s Answer to Plaintiff's Second Amended	ges 1-39 56 70	14 15 16 17 18		
12 13 14 15 16 17	Exhibit C Exhibit D Exhibit E	Revised Template Letter to Branch from Exhibit A, 2 Pag Midland's Production, Bates Defendant Midland Credit Management, Inc.'s Answer to Plaintiff's Second Amended Complaint 8-24-2015 Letter to Branch	72 res	14 15 16 17 18		
12 13 14 15 16 17 18 19 20	Exhibit C Exhibit D Exhibit E	Revised Template Letter to Branch from Exhibit A, 2 Pag Midland's Production, Bates Defendant Midland Credit Management, Inc.'s Answer to Plaintiff's Second Amended Complaint 8-24-2015 Letter to Branch 11-02-2016 Letter to Branch	72 75 75 75	14 15 16 17 18 19 20 21		
12 13 14 15 16 17 18 19 20 21	Exhibit C Exhibit D Exhibit E Exhibit F Exhibit G Exhibit H	from the Complaint Revised Template Letter to Branch from Exhibit A, 2 Pag Midland's Production, Bates Defendant Midland Credit Management, Inc.'s Answer to Plaintiff's Second Amended Complaint 8-24-2015 Letter to Branch 11-02-2016 Letter to Branch 3-08-2017 Letter to Branch	72 75 79	14 15 16 17 18 19 20		
12 13 14 15 16 17 18 19 20 21 22	Exhibit C Exhibit D Exhibit E	Revised Template Letter to Branch from Exhibit A, 2 Pag Midland's Production, Bates Defendant Midland Credit Management, Inc.'s Answer to Plaintiff's Second Amended Complaint 8-24-2015 Letter to Branch 11-02-2016 Letter to Branch	72 75 75 75	14 15 16 17 18 19 20 21		
12 13 14 15 16 17 18 19 20 21 22 23	Exhibit C Exhibit D Exhibit E Exhibit F Exhibit G Exhibit H	from the Complaint Revised Template Letter to Branch from Exhibit A, 2 Pag Midland's Production, Bates Defendant Midland Credit Management, Inc.'s Answer to Plaintiff's Second Amended Complaint 8-24-2015 Letter to Branch 11-02-2016 Letter to Branch 3-08-2017 Letter to Branch	72 75 79	14 15 16 17 18 19 20 21 22 23		
12 13 14 15 16 17 18 19 20 21 22	Exhibit C Exhibit D Exhibit E Exhibit F Exhibit G Exhibit H	from the Complaint Revised Template Letter to Branch from Exhibit A, 2 Pag Midland's Production, Bates Defendant Midland Credit Management, Inc.'s Answer to Plaintiff's Second Amended Complaint 8-24-2015 Letter to Branch 11-02-2016 Letter to Branch 3-08-2017 Letter to Branch	72 75 79	14 15 16 17 18 19 20 21 22		
12 13 14 15 16 17 18 19 20 21 22 23	Exhibit C Exhibit D Exhibit E Exhibit F Exhibit G Exhibit H	from the Complaint Revised Template Letter to Branch from Exhibit A, 2 Pag Midland's Production, Bates Defendant Midland Credit Management, Inc.'s Answer to Plaintiff's Second Amended Complaint 8-24-2015 Letter to Branch 11-02-2016 Letter to Branch 3-08-2017 Letter to Branch	72 75 79	14 15 16 17 18 19 20 21 22 23		

	ed Micciare - Pivik		Kingin vs. Midiand Credit Management, inc.
1	A. We only track for whether or not the person	1	Page 30 print vendor will handle the actual printing and then
2	called in or not.	2	sending of the letter.
3	Q. Okay. Let's go straight to the letter in the	3	Q. And which print vendors does Midland use?
4	case.	4	A. We use a number of them, and they've changed
5	MR. ZEMEL: Andrew, do you want a copy of the	5	over time.
6	letter?	6	Q. At any given time are you using one or many
7	MR. SCHWARTZ: Well, we may have to go off the	7	throughout the country?
8	record before you provide this, because that's not the	8	A. It's typically one primary and a couple
9	I've asked for the complete letter, which is the	9	smaller vendors that we'll use.
10	reverse side. And, also, that letter is cut off. I	10	Q. Okay. I'm going to mark Exhibit B, which is
11	only have a template.	11	Exhibit A from the complaint filed in this action.
12	Can we go off the record?	12	(Exhibit B marked for identification by
13	MR. ZEMEL: We can go off the record.	13	the Certified Shorthand Reporter.)
14	(Discussion held off the record.)	14	MR. SCHWARTZ: Again, for the record, this is
15	BY MR. ZEMEL:	15	only a partial front page of the July 20th, 2016,
16	Q. Back on.	16	letter. It's missing some instructions as well as the
17	Actually I want to ask you just a little bit	17	payment coupon, as well as the backer, which has
18	about letter vendors. Does Midland create and mail out	18	additional information.
19	the letters themselves or do they hire third parties?	19	MR. ZEMEL: And let's go off the record for a
20	A. What do you mean by "create and mail"?	20	second.
21	Q. Do they print the letters out themselves and	21	(Discussion held off the record.)
22	mail them themselves, or do they hire third-party	22	BY MR. ZEMEL:
23	companies to do that?	23	Q. Let's go on the record with this and we'll
24	A. Typically we do not print them. There are	24	clarify what this is.
25	some that we will print on small scale. But typically a	25	So I'm going to mark this as Exhibit C.
1	Page 31 (Exhibit C marked for identification by	1	Page 32 Also along the bottom there is a there's a
1 2	(Exhibit C marked for identification by	1 2	Also along the bottom there is a there's a
1 2 3	(Exhibit C marked for identification by the Certified Shorthand Reporter.) BY MR. ZEMEL:	2	Also along the bottom there is a there's a "the law limits," which is in Exhibit C but not in
2	(Exhibit C marked for identification by the Certified Shorthand Reporter.)	2	Also along the bottom there is a there's a
2	(Exhibit C marked for identification by the Certified Shorthand Reporter.) BY MR. ZEMEL: Q. Okay. So, Mr. McClure, Exhibit B is the	2 3 4	Also along the bottom there is a there's a "the law limits," which is in Exhibit C but not in Exhibit B; is that right?
2 3 4 5	(Exhibit C marked for identification by the Certified Shorthand Reporter.) BY MR. ZEMEL:	2 3 4 5	Also along the bottom there is a there's a "the law limits," which is in Exhibit C but not in Exhibit B; is that right? A. That's correct. And then there's also the,
2 3 4 5	(Exhibit C marked for identification by the Certified Shorthand Reporter.) BY MR. ZEMEL: Q. Okay. So, Mr. McClure, Exhibit B is the exhibit attached to the complaint in this action as	2 3 4 5	Also along the bottom there is a there's a "the law limits," which is in Exhibit C but not in Exhibit B; is that right? A. That's correct. And then there's also the, "After receiving your final payment, we will consider
2 3 4 5 6	(Exhibit C marked for identification by the Certified Shorthand Reporter.) BY MR. ZEMEL: Q. Okay. So, Mr. McClure, Exhibit B is the exhibit attached to the complaint in this action as Exhibit A. Exhibit B, from my understanding, is a	2 3 4 5 6 7	Also along the bottom there is a there's a "the law limits," which is in Exhibit C but not in Exhibit B; is that right? A. That's correct. And then there's also the, "After receiving your final payment, we will consider the account paid," is not on the Exhibit C.
2 3 4 5 6 7	(Exhibit C marked for identification by the Certified Shorthand Reporter.) BY MR. ZEMEL: Q. Okay. So, Mr. McClure, Exhibit B is the exhibit attached to the complaint in this action as Exhibit A. Exhibit B, from my understanding, is a similar form template but not quite the same.	2 3 4 5 6 7 8	Also along the bottom there is a there's a "the law limits," which is in Exhibit C but not in Exhibit B; is that right? A. That's correct. And then there's also the, "After receiving your final payment, we will consider the account paid," is not on the Exhibit C. Q. Okay. And the information below all of this,
2 3 4 5 6 7 8	(Exhibit C marked for identification by the Certified Shorthand Reporter.) BY MR. ZEMEL: Q. Okay. So, Mr. McClure, Exhibit B is the exhibit attached to the complaint in this action as Exhibit A. Exhibit B, from my understanding, is a similar form template but not quite the same. Is that right?	2 3 4 5 6 7 8	Also along the bottom there is a there's a "the law limits," which is in Exhibit C but not in Exhibit B; is that right? A. That's correct. And then there's also the, "After receiving your final payment, we will consider the account paid," is not on the Exhibit C. Q. Okay. And the information below all of this, which is the payment coupon, was that the same between
2 3 4 5 6 7 8	(Exhibit C marked for identification by the Certified Shorthand Reporter.) BY MR. ZEMEL: Q. Okay. So, Mr. McClure, Exhibit B is the exhibit attached to the complaint in this action as Exhibit A. Exhibit B, from my understanding, is a similar form template but not quite the same. Is that right? A. Exhibit C or B?	2 3 4 5 6 7 8 9	Also along the bottom there is a there's a "the law limits," which is in Exhibit C but not in Exhibit B; is that right? A. That's correct. And then there's also the, "After receiving your final payment, we will consider the account paid," is not on the Exhibit C. Q. Okay. And the information below all of this, which is the payment coupon, was that the same between Exhibit C and Exhibit B?
2 3 4 5 6 7 8 9	(Exhibit C marked for identification by the Certified Shorthand Reporter.) BY MR. ZEMEL: Q. Okay. So, Mr. McClure, Exhibit B is the exhibit attached to the complaint in this action as Exhibit A. Exhibit B, from my understanding, is a similar form template but not quite the same. Is that right? A. Exhibit C or B? Q. The difference between Exhibit yeah,	2 3 4 5 6 7 8 9	Also along the bottom there is a there's a "the law limits," which is in Exhibit C but not in Exhibit B; is that right? A. That's correct. And then there's also the, "After receiving your final payment, we will consider the account paid," is not on the Exhibit C. Q. Okay. And the information below all of this, which is the payment coupon, was that the same between Exhibit C and Exhibit B? A. They should be approximately the same.
2 3 4 5 6 7 8 9 10	(Exhibit C marked for identification by the Certified Shorthand Reporter.) BY MR. ZEMEL: Q. Okay. So, Mr. McClure, Exhibit B is the exhibit attached to the complaint in this action as Exhibit A. Exhibit B, from my understanding, is a similar form template but not quite the same. Is that right? A. Exhibit C or B? Q. The difference between Exhibit yeah, Exhibit C.	2 3 4 5 6 7 8 9 10 11	Also along the bottom there is a there's a "the law limits," which is in Exhibit C but not in Exhibit B; is that right? A. That's correct. And then there's also the, "After receiving your final payment, we will consider the account paid," is not on the Exhibit C. Q. Okay. And the information below all of this, which is the payment coupon, was that the same between Exhibit C and Exhibit B? A. They should be approximately the same. Q. Okay. So let's go looking at Let's start
2 3 4 5 6 7 8 9 10 11	(Exhibit C marked for identification by the Certified Shorthand Reporter.) BY MR. ZEMEL: Q. Okay. So, Mr. McClure, Exhibit B is the exhibit attached to the complaint in this action as Exhibit A. Exhibit B, from my understanding, is a similar form template but not quite the same. Is that right? A. Exhibit C or B? Q. The difference between Exhibit yeah, Exhibit C. A. Correct. Exhibit C is a slightly different	2 3 4 5 6 7 8 9 10 11 12	Also along the bottom there is a there's a "the law limits," which is in Exhibit C but not in Exhibit B; is that right? A. That's correct. And then there's also the, "After receiving your final payment, we will consider the account paid," is not on the Exhibit C. Q. Okay. And the information below all of this, which is the payment coupon, was that the same between Exhibit C and Exhibit B? A. They should be approximately the same. Q. Okay. So let's go looking at Let's start looking only at Exhibit B. Is Exhibit B a form
2 3 4 5 6 7 8 9 10 11 12 13	(Exhibit C marked for identification by the Certified Shorthand Reporter.) BY MR. ZEMEL: Q. Okay. So, Mr. McClure, Exhibit B is the exhibit attached to the complaint in this action as Exhibit A. Exhibit B, from my understanding, is a similar form template but not quite the same. Is that right? A. Exhibit C or B? Q. The difference between Exhibit yeah, Exhibit C. A. Correct. Exhibit C is a slightly different form as Exhibit B.	2 3 4 5 6 7 8 9 10 11 12 13	Also along the bottom there is a there's a "the law limits," which is in Exhibit C but not in Exhibit B; is that right? A. That's correct. And then there's also the, "After receiving your final payment, we will consider the account paid," is not on the Exhibit C. Q. Okay. And the information below all of this, which is the payment coupon, was that the same between Exhibit C and Exhibit B? A. They should be approximately the same. Q. Okay. So let's go looking at Let's start looking only at Exhibit B. Is Exhibit B a form template?
2 3 4 5 6 7 8 9 10 11 12 13 14	(Exhibit C marked for identification by the Certified Shorthand Reporter.) BY MR. ZEMEL: Q. Okay. So, Mr. McClure, Exhibit B is the exhibit attached to the complaint in this action as Exhibit A. Exhibit B, from my understanding, is a similar form template but not quite the same. Is that right? A. Exhibit C or B? Q. The difference between Exhibit yeah, Exhibit C. A. Correct. Exhibit C is a slightly different form as Exhibit B. Q. Can you I'm sorry.	2 3 4 5 6 7 8 9 10 11 12 13	Also along the bottom there is a there's a "the law limits," which is in Exhibit C but not in Exhibit B; is that right? A. That's correct. And then there's also the, "After receiving your final payment, we will consider the account paid," is not on the Exhibit C. Q. Okay. And the information below all of this, which is the payment coupon, was that the same between Exhibit C and Exhibit B? A. They should be approximately the same. Q. Okay. So let's go looking at Let's start looking only at Exhibit B. Is Exhibit B a form template? A. Exhibit B is a actual letter sent to the
2 3 4 5 6 7 8 9 10 11 12 13 14 15	(Exhibit C marked for identification by the Certified Shorthand Reporter.) BY MR. ZEMEL: Q. Okay. So, Mr. McClure, Exhibit B is the exhibit attached to the complaint in this action as Exhibit A. Exhibit B, from my understanding, is a similar form template but not quite the same. Is that right? A. Exhibit C or B? Q. The difference between Exhibit yeah, Exhibit C. A. Correct. Exhibit C is a slightly different form as Exhibit B. Q. Can you I'm sorry. Can you explain for the record what the	2 3 4 5 6 7 8 9 10 11 12 13 14 15	Also along the bottom there is a there's a "the law limits," which is in Exhibit C but not in Exhibit B; is that right? A. That's correct. And then there's also the, "After receiving your final payment, we will consider the account paid," is not on the Exhibit C. Q. Okay. And the information below all of this, which is the payment coupon, was that the same between Exhibit C and Exhibit B? A. They should be approximately the same. Q. Okay. So let's go looking at Let's start looking only at Exhibit B. Is Exhibit B a form template? A. Exhibit B is a actual letter sent to the plaintiff.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	(Exhibit C marked for identification by the Certified Shorthand Reporter.) BY MR. ZEMEL: Q. Okay. So, Mr. McClure, Exhibit B is the exhibit attached to the complaint in this action as Exhibit A. Exhibit B, from my understanding, is a similar form template but not quite the same. Is that right? A. Exhibit C or B? Q. The difference between Exhibit yeah, Exhibit C. A. Correct. Exhibit C is a slightly different form as Exhibit B. Q. Can you I'm sorry. Can you explain for the record what the difference is between Exhibit C and what was provided to	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Also along the bottom there is a there's a "the law limits," which is in Exhibit C but not in Exhibit B; is that right? A. That's correct. And then there's also the, "After receiving your final payment, we will consider the account paid," is not on the Exhibit C. Q. Okay. And the information below all of this, which is the payment coupon, was that the same between Exhibit C and Exhibit B? A. They should be approximately the same. Q. Okay. So let's go looking at Let's start looking only at Exhibit B. Is Exhibit B a form template? A. Exhibit B is a actual letter sent to the plaintiff. Q. And is this a template letter that was sent or
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	(Exhibit C marked for identification by the Certified Shorthand Reporter.) BY MR. ZEMEL: Q. Okay. So, Mr. McClure, Exhibit B is the exhibit attached to the complaint in this action as Exhibit A. Exhibit B, from my understanding, is a similar form template but not quite the same. Is that right? A. Exhibit C or B? Q. The difference between Exhibit yeah, Exhibit C. A. Correct. Exhibit C is a slightly different form as Exhibit B. Q. Can you I'm sorry. Can you explain for the record what the difference is between Exhibit C and what was provided to the plaintiff as Exhibit B.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Also along the bottom there is a there's a "the law limits," which is in Exhibit C but not in Exhibit B; is that right? A. That's correct. And then there's also the, "After receiving your final payment, we will consider the account paid," is not on the Exhibit C. Q. Okay. And the information below all of this, which is the payment coupon, was that the same between Exhibit C and Exhibit B? A. They should be approximately the same. Q. Okay. So let's go looking at Let's start looking only at Exhibit B. Is Exhibit B a form template? A. Exhibit B is a actual letter sent to the plaintiff. Q. And is this a template letter that was sent or was this letter created specifically for the plaintiff
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	(Exhibit C marked for identification by the Certified Shorthand Reporter.) BY MR. ZEMEL: Q. Okay. So, Mr. McClure, Exhibit B is the exhibit attached to the complaint in this action as Exhibit A. Exhibit B, from my understanding, is a similar form template but not quite the same. Is that right? A. Exhibit C or B? Q. The difference between Exhibit yeah, Exhibit C. A. Correct. Exhibit C is a slightly different form as Exhibit B. Q. Can you I'm sorry. Can you explain for the record what the difference is between Exhibit C and what was provided to the plaintiff as Exhibit B. A. There are several subtle changes. So you'll	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Also along the bottom there is a there's a "the law limits," which is in Exhibit C but not in Exhibit B; is that right? A. That's correct. And then there's also the, "After receiving your final payment, we will consider the account paid," is not on the Exhibit C. Q. Okay. And the information below all of this, which is the payment coupon, was that the same between Exhibit C and Exhibit B? A. They should be approximately the same. Q. Okay. So let's go looking at Let's start looking only at Exhibit B. Is Exhibit B a form template? A. Exhibit B is a actual letter sent to the plaintiff. Q. And is this a template letter that was sent or was this letter created specifically for the plaintiff in this matter?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	(Exhibit C marked for identification by the Certified Shorthand Reporter.) BY MR. ZEMEL: Q. Okay. So, Mr. McClure, Exhibit B is the exhibit attached to the complaint in this action as Exhibit A. Exhibit B, from my understanding, is a similar form template but not quite the same. Is that right? A. Exhibit C or B? Q. The difference between Exhibit yeah, Exhibit C. A. Correct. Exhibit C is a slightly different form as Exhibit B. Q. Can you I'm sorry. Can you explain for the record what the difference is between Exhibit C and what was provided to the plaintiff as Exhibit B. A. There are several subtle changes. So you'll see, beneath the MC account number, Current Balance	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Also along the bottom there is a there's a "the law limits," which is in Exhibit C but not in Exhibit B; is that right? A. That's correct. And then there's also the, "After receiving your final payment, we will consider the account paid," is not on the Exhibit C. Q. Okay. And the information below all of this, which is the payment coupon, was that the same between Exhibit C and Exhibit B? A. They should be approximately the same. Q. Okay. So let's go looking at Let's start looking only at Exhibit B. Is Exhibit B a form template? A. Exhibit B is a actual letter sent to the plaintiff. Q. And is this a template letter that was sent or was this letter created specifically for the plaintiff in this matter? A. It would have been a form template.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	(Exhibit C marked for identification by the Certified Shorthand Reporter.) BY MR. ZEMEL: Q. Okay. So, Mr. McClure, Exhibit B is the exhibit attached to the complaint in this action as Exhibit A. Exhibit B, from my understanding, is a similar form template but not quite the same. Is that right? A. Exhibit C or B? Q. The difference between Exhibit yeah, Exhibit C. A. Correct. Exhibit C is a slightly different form as Exhibit B. Q. Can you I'm sorry. Can you explain for the record what the difference is between Exhibit C and what was provided to the plaintiff as Exhibit B. A. There are several subtle changes. So you'll see, beneath the MC account number, Current Balance Discount, there's a shifting of information, a slight	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Also along the bottom there is a there's a "the law limits," which is in Exhibit C but not in Exhibit B; is that right? A. That's correct. And then there's also the, "After receiving your final payment, we will consider the account paid," is not on the Exhibit C. Q. Okay. And the information below all of this, which is the payment coupon, was that the same between Exhibit C and Exhibit B? A. They should be approximately the same. Q. Okay. So let's go looking at Let's start looking only at Exhibit B. Is Exhibit B a form template? A. Exhibit B is a actual letter sent to the plaintiff. Q. And is this a template letter that was sent or was this letter created specifically for the plaintiff in this matter? A. It would have been a form template. Q. Does this template have a specific name that's
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	(Exhibit C marked for identification by the Certified Shorthand Reporter.) BY MR. ZEMEL: Q. Okay. So, Mr. McClure, Exhibit B is the exhibit attached to the complaint in this action as Exhibit A. Exhibit B, from my understanding, is a similar form template but not quite the same. Is that right? A. Exhibit C or B? Q. The difference between Exhibit yeah, Exhibit C. A. Correct. Exhibit C is a slightly different form as Exhibit B. Q. Can you I'm sorry. Can you explain for the record what the difference is between Exhibit C and what was provided to the plaintiff as Exhibit B. A. There are several subtle changes. So you'll see, beneath the MC account number, Current Balance Discount, there's a shifting of information, a slight font size differences and square sizes. Also has the	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Also along the bottom there is a there's a "the law limits," which is in Exhibit C but not in Exhibit B; is that right? A. That's correct. And then there's also the, "After receiving your final payment, we will consider the account paid," is not on the Exhibit C. Q. Okay. And the information below all of this, which is the payment coupon, was that the same between Exhibit C and Exhibit B? A. They should be approximately the same. Q. Okay. So let's go looking at Let's start looking only at Exhibit B. Is Exhibit B a form template? A. Exhibit B is a actual letter sent to the plaintiff. Q. And is this a template letter that was sent or was this letter created specifically for the plaintiff in this matter? A. It would have been a form template. Q. Does this template have a specific name that's used to refer to this template?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	(Exhibit C marked for identification by the Certified Shorthand Reporter.) BY MR. ZEMEL: Q. Okay. So, Mr. McClure, Exhibit B is the exhibit attached to the complaint in this action as Exhibit A. Exhibit B, from my understanding, is a similar form template but not quite the same. Is that right? A. Exhibit C or B? Q. The difference between Exhibit yeah, Exhibit C. A. Correct. Exhibit C is a slightly different form as Exhibit B. Q. Can you I'm sorry. Can you explain for the record what the difference is between Exhibit C and what was provided to the plaintiff as Exhibit B. A. There are several subtle changes. So you'll see, beneath the MC account number, Current Balance Discount, there's a shifting of information, a slight font size differences and square sizes. Also has the backer The scrolls are just slightly different. The	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Also along the bottom there is a there's a "the law limits," which is in Exhibit C but not in Exhibit B; is that right? A. That's correct. And then there's also the, "After receiving your final payment, we will consider the account paid," is not on the Exhibit C. Q. Okay. And the information below all of this, which is the payment coupon, was that the same between Exhibit C and Exhibit B? A. They should be approximately the same. Q. Okay. So let's go looking at Let's start looking only at Exhibit B. Is Exhibit B a form template? A. Exhibit B is a actual letter sent to the plaintiff. Q. And is this a template letter that was sent or was this letter created specifically for the plaintiff in this matter? A. It would have been a form template. Q. Does this template have a specific name that's used to refer to this template? A. It does.